

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:)	CHAPTER 11
)	
FIELDWOOD ENERGY LLC, <i>et al.</i> , ¹)	CASE NO. 20-33948 (MI)
)	
DEBTORS.)	JOINTLY ADMINISTERED
)	

**PHILADELPHIA INDEMNITY INSURANCE COMPANY'S WITNESS AND EXHIBIT
LIST FOR JUNE 18, 2021, VIDEO/TELEPHONIC CONFIRMATION HEARING**

Bankruptcy Case No. 20-33948	Debtor: Fieldwood Energy LLC and Its Affiliated Debtors (the “Debtors”)
	Judge: Honorable Marvin Isgur
	Hearing Date: June 18, 2021
	Hearing Time: 9:30 A.M.
	Location: Courtroom 400, 4 th Fl. 515 Rusk Ave. Houston, TX 77002
	Party’s Name: Philadelphia Indemnity Insurance Company (“Philadelphia”)
	Attorneys’ Names: Robert W. Miller and Jacob E. Bolton
	Attorney’s Phone: (615) 742-9320
	Nature of Proceeding: Confirmation Hearing (the “Hearing”)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

WITNESSES

Philadelphia may call any of the following witnesses at the Hearing:

1. Michael Dane, CFO – Fieldwood Energy, LLC / Fact Witness
2. Jon Graham, Sole Manager - FWE I / Fact Witness
3. Lily Cheung, P.E. – Netherland Sewell & Associates / Expert Witness
4. A representative from Philadelphia to authenticate the surety bonds and indemnity agreements, and any other documents/evidence that needs testimonial evidence to support its admissibility / Fact Witness
5. Any witness called or listed by any other party
6. Any witness required for rebuttal

EXHIBITS

Philadelphia may offer into evidence any one or more of the following exhibits:

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
1	Copy of Bond No. PB03251500040				
2	Copy of General Indemnity Agreement executed by Fieldwood Energy, LLC				
3	Copy of Form Surety Bond				
4	Debtors' Responses to Interrogatories and Request for Production of Documents dated May 6, 2021 (Filed Under Seal)				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
5	Debtors' Amended Responses to Interrogatories and Request for Production of Documents dated May 12, 2021 (Filed Under Seal)				
6	Michael Dane Deposition Transcript (Filed Under Seal)				
7	Jon Graham Deposition Transcript (Filed Under Seal)				
8	Jon Paul Hanson Deposition Transcript (Filed Under Seal)				
9	Lily Cheung, P.E. Deposition Transcript (Filed Under Seal)				
10	Brett Cupit, Esq. Deposition Transcript (Filed Under Seal)				
11	Jon Paul Hanson Expert Report dated April 21, 2021 (Filed Under Seal)				
12	Jon Paul Hanson Rebuttal Report to BP's Report dated May 24, 2021 (Filed Under Seal)				
13	Marc J. Brown, CFA Expert Report dated April 21, 2021 (Filed Under Seal)				
14	Lily Cheung, P.E. Expert Report dated May 24, 2021 (Filed Under Seal)				
15	Edward M. McDonough Expert Report dated May 10, 2021 (Filed Under Seal)				
16	Geoffrey G. Roberts, P.E. Expert Report dated May 10, 2021 (Filed Under Seal)				
17	FWE-00000008 – FWE I One-lines (Filed Under Seal)				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
18	FWE-0000016 – FWE I Model (Filed Under Seal)				
19	FWE-0000017 – ARIES File				
20	FWE-0038675 – FWE I Model (Updated) (Filed Under Seal)				
21	FWE-0045265 – Fields Not Returning to Production / Timing of Fields Returning (Filed Under Seal)				
22	FWE-0045403 Total Abandonment with Field Status (Filed Under Seal)				
23	FWE-0000008 – FWE I Onelines_YE2020_LWC Comments (Lily Cheung, P.E. Work Notes) (Filed Under Seal)				
24	FWE-0121 (Lily Cheung, P.E. Work Notes)				
25	FWE-0038675_FWE0000016 with live links Revised (Lily Cheung, P.E. Work Notes) (Filed Under Seal)				
26	FWE-0045403 Total Abandonment with Field Status (Lily Cheung, P.E. Work Notes) (Filed Under Seal)				
27	FWE I Summaries 1P Revised (Lily Cheung, P.E. Work Notes) (Filed Under Seal)				
28	2013 Apache Decommissioning Agreement including All Amendments (Filed Under Seal)				
29	May 11, 2021 E-mail from Sureties to Debtors Advising of Debtors' Obligation to Supplement				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
30	Sale Offers for FWE I Assets – FWE-0047937, FWE-0047938, FWE-0047949 (Filed Under Seal)				
31	FWE-034 (produced to Philadelphia on 6/14/21) (Filed Under Seal)				
32	FWE-0049079 (produced to Philadelphia on 6/14/21) (Filed Under Seal)				
33	FWE-0049108 (produced to Philadelphia on 6/14/21) (Filed Under Seal)				
34	FWE-0049109 (produced to Philadelphia on 6/14/21) (Filed Under Seal)				
35	FWE-0049174 (produced to Philadelphia on 6/14/21) (Filed Under Seal)				
36	FWE-0049177 (produced to Philadelphia on 6/14/21) (Filed Under Seal)				
	All documents or data relied upon by Lily Cheung, P.E. in formulating her report, and listed on p. 4 of her report				
	Any exhibit designated by any other party				
	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases				
	Any document produced by any party in discovery				
	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party				

Philadelphia Indemnity Insurance Company reserves any and all rights to amend the *Exhibit and Witness List*, to call any witnesses designated by any other party and use any other Exhibit designated by any other party to the hearing

Respectfully submitted,

MANIER & HEROD, P.C.

/s/ Michael E. Collins

Michael E. Collins (TX Bar No. 24029006)

Robert W. Miller (admitted *pro hac vice*)

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*Attorneys for Philadelphia Indemnity Insurance
Company*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system and served upon all parties receiving notice pursuant to the CM/ECF system on June 16, 2021.

/s/ Michael E. Collins

Michael E. Collins